

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**SUMMARY COVER SHEET TO THE FIRST INTERIM FEE APPLICATION OF
RACHEL KENNERLY, LLC AS TAX ACCOUNTANT TO THE DEBTOR FOR THE
FEE PERIOD FROM DECEMBER 6, 2022 THROUGH MAY 15, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant's Role in Case:	Tax Accountant to Debtor	
Date Order of Appointment Signed:	Docket No. 111	
Interim Application (X) No. 1 st Final Application ()	First Interim	
	Beginning of Period	End of Period
Time period covered by this Interim Fee Application for which interim compensation has not previously been awarded:	12/06/2022	__05/15/2023
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? Yes		
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? Yes		
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? Yes		
Do expense reimbursements represent actual and necessary expenses incurred? Yes		
Total fees requested in this Application: \$11,025.00		
Total expense reimbursements requested in this Application: 0.00		
Total professional hours covered by this Application: 36.75		
Average hourly rate for professionals: \$300.00		
Total fees and expenses requested in this Application: \$11,025.00		
Total fees and expenses awarded in all prior Application: 10,575.00		

Plan Status: To date, the Debtor has not yet filed a chapter 11 plan of reorganization. The Debtor remains focused on coalescing consensus across their capital structure for a value-maximizing Plan and are engaging with their key stakeholders regarding a consensual restructuring.

Primary Benefits: During the Fee Period, in conjunction with co-counsel, C&D diligently represented the Debtor on a wide variety of complex restructuring matters that helped the Debtor smoothly transition into chapter 11. C&D, in conjunction with co-counsel, advised the Debtor on matters related to first day motions, resolution of vendor issues, preparation of second day motions, and the local procedures and practice in this District. C&D assisted in drafting and organizing all professional retention applications and coordinating a fee application process. In conjunction with co-counsel, C&D advised on lease matters, including issues related to lease rejection and assumption, and was actively involved in formulating a lease negotiation plan and drafting lease amendments.

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this application was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Rachel Kennerly (“Kennerly”), tax accountant to the debtor and debtor-in-possession Alexander E. Jones (“Jones” or “Debtor”), hereby submits its *First Interim Fee Application for Allowance and Payment of Fees and Expenses as Tax Accountant to the Debtor for the Period From December 6, 2022 Through May 15, 2023* (the “Application”) for interim allowance of (a) compensation in the amount of \$11,025.00 for professional services C&D rendered to the Debtor from December 6, 2022 through May 15, 2023 (the “Fee Period”) and (b) reimbursement of actual and necessary expenses in the amount of \$0.00 that Kennerly incurred during the Fee Period.

Itemization of Services Rendered and Expenses Incurred

1. In support of this Application, Kennerly attaches the following exhibits:

EXHIBIT	DESCRIPTION
A.	Notice of Rachel Kennerly’s First Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Tax Accountant to the Debtor for the Period from December 6, 2022 Through January 31, 2023 [Docket No. 195]
B.	Notice of Rachel Kennerly’s Second Monthly Fee Statement for Compensation of Services Rendered and Reimbursement of Expenses as Tax Accountant to the Debtor for the Period from February 1, 2023 Through March 31, 2023 [Docket No. 260]

2. Although every effort has been made to include all fees and expenses incurred during the Fee Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Fee Period. Kennerly reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent

fee applications will be filed in accordance with title 11 of the United States Code, the Federal Rules of Bankruptcy Procedure, the Bankruptcy Local Rules for the Southern District of Texas, and the Interim Compensation Order.

3. Kennerly requests that this Court enter an order (a) granting interim allowance of compensation for professional services rendered by Kennerly during the Fee Period in the amount of \$11,025.00, (b) granting reimbursement of actual and necessary expenses incurred by Kennerly during the Fee Period in the amount of \$0.00, (c) authorizing and directing the Debtor to pay the fees and expenses to Kennerly as requested, less any fees and expenses previously paid pursuant to the Interim Compensation Order, for the Fee Period, and (d) granting such other and further relief as is just and proper.

Houston, TX
Dated: May 30, 2023

RACHEL KENNERLY, LLC.

By: /s/ Rachel Kennerly
Rachel Kennerly
3035 Ted Trout Dr.
Lufkin, TX 75904
Telephone: 903-631-0317
Email: rachel@kennerlycpa.com

**TAX ACCOUNTANT FOR DEBTOR,
ALEXANDER E. JONES**

CERTIFICATE OF SERVICE

I certify that on May 30, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

First Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**FIRST MONTHLY FEE STATEMENT OF RACHEL KENNERLY, LLC FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
TAX ACCOUNTANT TO THE DEBTOR FOR THE PERIOD FROM
DECEMBER 6, 2022 THROUGH JANUARY 31, 2023**

Name of Applicant:	Rachel Kennerly, LLC	
Applicant's Role in Case:	Tax Accountant to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #111)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	12/06/2022	01/31/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:		\$2,820.00 ¹ (80% of \$3,525.00)
Total Reimbursable Expenses Requested in this Statement:		\$0.00
Summary of Fees for the Period Covered by this Statement		
Professional Fees in this Statement:		\$3,525.00
Total Actual Professional Hours Covered by this Statement:		11.75
Average Hourly Rate for Professionals:		\$300.00

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

¹ Kennerly is holding \$200,00.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Rachel Kennerly (“Kennerly”), as tax accountant to the Debtor, hereby files its *First Monthly Fee Statement of Rachel Kennerly, LLC for Allowance of Compensation for Services Rendered as Tax Accountant to the Debtor for the Period from December 6, 2022 through January 31, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, Kennerly seeks interim payment of \$2,820.00 (80% of \$3,525.00) as compensation for professional services rendered to the Debtor during the period from December 6, 2022 through January 31, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$0.00, for a total amount of \$2,820.00 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, Kennerly submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Fees by Category as Tax Accountant for the Fee Period*, attached as **Exhibit B**, and a *Detailed Record of Fees as Tax Accountant for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order),

and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, Kennerly submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Kennerly reserves the right

to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, Kennerly respectfully submits support for its fees in the amount of \$3,525.00 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$0.00 for reasonable, actual and necessary expenses incurred during the Fee Period. Kennerly further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to Kennerly the amount of \$2,820.00² which is equal to the sum of 80% of Kennerly's fees and 100% of Kennerly's expenses incurred during the Fee Period.

² Such payment to be made first from any existing retainer funds held by Kennerly for the Debtor.

Houston, TX
Dated: March 2, 2023

RACHEL KENNERLY, LLC.

By: /s/ Rachel Kennerly
Rachel Kennerly
3035 Ted Trout Dr.
Lufkin, TX 75904
Telephone: 903-631-0317
Email: rachel@kennerlycpa.com

**TAX ACCOUNTANT FOR DEBTOR,
ALEXANDER E. JONES**

CERTIFICATE OF SERVICE

I certify that on March 2, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Ground Transportation	0.00
Lodging/Travel	0.00

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>
B110 Case Administration	0.00
B120 Asset Analysis and Recovery	0.00
B130 Asset Disposition	0.00
B140 Relief from Stay/Adequate Protection	0.00
B150 Meetings of & Communications with Creditors	0.00
B160 Fee/Employment Applications	1.25
B170 Fee/Employment Objections	0.00
B180 Avoidance Action Analysis	0.00
B185 Assumption/Rejection of Executory Contracts	0.00
B190 Other Contested Matters	0.00
B195 Non-Working Travel	0.00
B210 Business Operations	0.00
B220 Employee Benefits/Pensions	0.00
B230 Financing/Cash Collections	0.00
B240 Tax Issues	10.5
B250 Real Estate	0.00
B260 Board of Directors Matters	0.00
B310 Claims Administration and Objections	0.00
B320 Plan and Disclosure Statement	0.00
B410 General Bankruptcy Advice/Opinions	0.00
B420 Restructurings	0.00
TOTALS:	11.75

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



February 28, 2023

Alex E. Jones
c/o Shelby A. Jordan
Jordan & Ortiz, P.C.
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Re: **Alexander E. Jones, Debtor In Possession**Case No. **22-33553**Billing Period: **December 6 through January 31, 2023**Invoice No. **AJ20230131****Professional Services****Rendered:**

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>	<u>Task Code</u>
12/6/2022	RK	Telephone consult/introduction to Bob Schleizer; update on status of 2021 tax return	0.50	\$ 150.00	B240
12/7/2022	RK	Telephone call to David Jones with questions about 2021 tax return	0.25	75.00	B240
12/9/2022	RK	Respond to Caylin Craig email re: qualifications; review billing/time	0.75	225.00	B160
		Emails to Lorrie Grottke, et al at Crowe, LLP to request information on prior year tax returns;			
12/13/2022	RK	telephone call w/David Jones	0.50	150.00	B240
12/16/2022	RK	Telephone call w/Bob Schleizer re: crypto donations; consult w/EA re: crypto gifts	0.50	150.00	B240
12/16/2022	RK	Emails to former CPA's with questions	0.50	150.00	B240
12/22/2022	RK	Email to Bob S. re: 2021 tax return	0.50	150.00	B240
12/22/2022	RK	Review & sign declaration & return to Caylin	0.25	75.00	B160
12/30/2022	RK	Review updated declaration; give okay to Caylin	0.25	75.00	B160
1/4/2023	RK	Email to Bob S. re: 2021 tax return/2022 estimate; email to Dani W & Jeff S re: 2022 data	0.50	150.00	B240
1/5/2023	RK	Email to Dani & Jeff Shulse re: 2021 & 2022 crypto transactions	0.50	150.00	B240
1/11/2023	RK	Consult with CPA re: crypto gifts; email Bob S.	1.50	450.00	B240
1/13/2023	RK	Telephone call with Bob S re: crypto gifts 2021 & 2022	0.50	150.00	B240
1/16/2023	RK	Consult another CPA re: taxability of crypto gifts	0.25	75.00	B240
1/18/2023	RK	Follow up email to Dani & Jeff Shulse re: 2021 & 2022 crypto transactions	0.25	75.00	B240
1/20/2023	RK	Telephone call w/Bob S & Tyler Bennett re: taxability of crypto gifts; additional research	2.50	750.00	B240
1/23/2023	RK	Email to Bob S re: taxability of crypto gifts	0.50	150.00	B240
1/24/2023	RK	Email to Jeff, Dani & Melinda Flores re: questions on 2021 general ledger items	0.50	150.00	B240
1/26/2023	RK	Telephone call w/Bob re: taxability of crypto gifts	0.25	75.00	B240
1/26/2023	RK	Telephone call w/Jeff S re: 2021 tax questions; email to Melinda Flores re: fixed asset questions	0.50	150.00	B240
			11.75	\$ 3,525.00	

Expenses

From attached expense breakdown

\$ -

Total Invoice Amount**\$ 3,525.00**

Rachel Kennerly, LLC
3039 Ted Trout Dr
Lufkin, TX 75904

EXHIBIT “B”

Second Monthly Fee Statement

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**SECOND MONTHLY FEE STATEMENT OF RACHEL KENNERLY, LLC FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
TAX ACCOUNTANT TO THE DEBTOR FOR THE PERIOD FROM
FEBRUARY 1, 2023 THROUGH MARCH 31, 2023**

Name of Applicant:	Rachel Kennerly, LLC	
Applicant's Role in Case:	Tax Accountant to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #111)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	02/01/2023	03/31/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:		\$5,640.00 ¹ (80% of \$7,050.00)
Total Reimbursable Expenses Requested in this Statement:		\$0.00
Summary of Fees for the Period Covered by this Statement		
Professional Fees in this Statement:		\$5,640.00
Total Actual Professional Hours Covered by this Statement:		23.50
Average Hourly Rate for Professionals:		\$300.00

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

¹ Kennerly's First Monthly Fee Statement inadvertently indicated it was holding \$200,000.00 as a retainer in its trust account. The correct retainer balance at the time of filing the First Monthly Statement was \$1,250.00. As of the filing of this Monthly Fee Statement Kennerly is holding -0- funds as a retainer in its trust account.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Rachel Kennerly (“Kennerly”), as tax accountant to the Debtor, hereby files its *Second Monthly Fee Statement of Rachel Kennerly, LLC for Allowance of Compensation for Services Rendered as Tax Accountant to the Debtor for the Period from February 1, 2023 through March 31, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, Kennerly seeks interim payment of \$5,640.00 (80% of \$7,050.00) as compensation for professional services rendered to the Debtor during the period from February 1, 2023 through March 31, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$0.00, for a total amount of 5,640.00 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, Kennerly submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Fees by Category as Tax Accountant for the Fee Period*, attached as **Exhibit B**, and a *Detailed Record of Fees as Tax Accountant for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order),

and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, Kennerly submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Kennerly reserves the right to make further application to this Court for allowance of such fees and expenses not included

herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, Kennerly respectfully submits support for its fees in the amount of \$7,050.00 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$0.00 for reasonable, actual and necessary expenses incurred during the Fee Period. Kennerly further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to Kennerly the amount of \$5,640.00 which is equal to the sum of 80% of Kennerly's fees and 100% of Kennerly's expenses incurred during the Fee Period.

Houston, TX
Dated: April 30, 2023

RACHEL KENNERLY, LLC.

By: /s/ Rachel Kennerly
Rachel Kennerly
3035 Ted Trout Dr.
Lufkin, TX 75904
Telephone: 903-631-0317
Email: rachel@kennerlycpa.com

**TAX ACCOUNTANT FOR DEBTOR,
ALEXANDER E. JONES**

CERTIFICATE OF SERVICE

I certify that on April 30, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Ground Transportation	0.00
Lodging/Travel	0.00

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>
B110 Case Administration	0.00
B120 Asset Analysis and Recovery	0.00
B130 Asset Disposition	0.00
B140 Relief from Stay/Adequate Protection	0.00
B150 Meetings of & Communications with Creditors	0.00
B160 Fee/Employment Applications	0.00
B170 Fee/Employment Objections	0.00
B180 Avoidance Action Analysis	0.00
B185 Assumption/Rejection of Executory Contracts	0.00
B190 Other Contested Matters	0.00
B195 Non-Working Travel	0.00
B210 Business Operations	0.00
B220 Employee Benefits/Pensions	0.00
B230 Financing/Cash Collections	0.00
B240 Tax Issues	23.50
B250 Real Estate	0.00
B260 Board of Directors Matters	0.00
B310 Claims Administration and Objections	0.00
B320 Plan and Disclosure Statement	0.00
B410 General Bankruptcy Advice/Opinions	0.00
B420 Restructurings	0.00
TOTALS:	23.50

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



March 31, 2023

Alex E. Jones
c/o Shelby A. Jordan
Jordan & Ortiz, P.C.
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Re: **Alexander E. Jones, Debtor In Possession** Case No. **22-33553**

Billing Period: February 1 through February 28, 2023
Invoice No. AJ20230228

Professional Services

Rendered:

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>	<u>Task Code</u>
2/8/2023	RK	Follow up with Melinda re: fixed asset questions	0.25	75.00	B240
2/9/2023	RK	Work on 2021 tax return	1.00	300.00	B240
2/9/2023	RK	Telephone call w/Bob S. re: status update of 2021 tax return	0.50	150.00	B240
2/10/2023	RK	Telephone call w/Bob re: 2021 tax return	0.25	75.00	B240
2/13/2023	RK	Work on 2021 tax return	1.50	450.00	B240
2/13/2023	RK	Emails to/from Bob S re: income tax info needed	0.50	150.00	B240
2/14/2023	RK	Emails & telephone correspondence w/Bob S. re: status of 2021 tax return/info needed	0.75	225.00	B240
2/16/2023	RK	Telephone call w/Bob re: crypto & helicopter lease	0.25	75.00	B240
2/16/2023	RK	Email Jeff & Dani re: status of 2022 accounting data	0.25	75.00	B240
2/23/2023	RK	Work on 2021 tax return	2.25	675.00	B240
2/23/2023	RK	Telephone consult w/Bob S & Nancy Collins re: taxability of crypto gifts	1.25	375.00	B240
2/23/2023	RK	Forward prelim copy of return to Bob	0.25	75.00	B240
			9.00	\$ 2,700.00	

Expenses

From attached expense breakdown

Total Invoice Amount

\$ -
\$ 2,700.00

Rachel Kennerly, LLC
3039 Ted Trout Dr
Lufkin, TX 75904



April 30, 2023

Alex E. Jones
c/o Shelby A. Jordan
Jordan & Ortiz, P.C.
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Re: **Alexander E. Jones, Debtor In Possession** Case No. **22-33553**

Billing Period: **March 1 through March 31, 2023**
Invoice No. **AJ20230331**

Professional Services**Rendered:**

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>	<u>Task Code</u>
3/1/2023	RK	Telephone call w/Bob S re: return status	0.50	150.00	B240
3/8/2023	RK	Telephone & email correspondence w/Bob S re: return status; crypto; helicopter lease	0.75	225.00	B240
3/16/2023	RK	Forward copies of JLJR q's to Bob	0.50	150.00	B240
3/18/2023	RK	Consult w/T. Toucet, CPA re: crypto gifts	0.50	150.00	B240
3/20/2023	RK	Telephone consult w/Nancy Collins re: crypto gifts	0.50	150.00	B240
3/21/2023	RK	Finalize tax return; reconcile to tax workpapers	2.00	600.00	B240
3/22/2023	RK	Prep for & meet w/Bob to review 2021 tax return; paperwork for bankruptcy court	4.00	1,200.00	B240
3/22/2023	RK	2022 Tax projection	1.50	450.00	B240
3/23/2023	RK	Complete 2022 Tax projection; forward to Bob	0.75	225.00	B240
3/25/2023	RK	review email from Bob re: youngevity; update 2021 tax return; forward to Bob	1.25	375.00	B240
3/28/2023	RK	correspondence w/Bob re: 2021 return	0.50	150.00	B240
3/29/2023	RK	File return - issues w/spouse's name not matching IRS database; update 2020 carryforward	1.50	450.00	B240
3/30/2023	RK	Forward e-file confirmation to Bob	0.25	75.00	B240
			14.50	\$ 4,350.00	

Expenses

From attached expense breakdown

Total Invoice Amount

\$ -
\$ 4,350.00

Rachel Kennerly, LLC
3039 Ted Trout Dr
Lufkin, TX 75904

EXHIBIT “C”

Invoices – April and May, 2023

Alex E. Jones
c/o Shelby A. Jordan
Jordan & Ortiz, P.C.
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Case No. 22-33553

Invoice No. AJ20230331

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>	<u>Task Code</u>
4/21/2023	RK	respond to Bob's email re: IRS bankruptcy issue	0.25	75.00	B240
4/26/2023	RK	follow up email to Bob re: IRS bankruptcy issue	0.50	150.00	B240
4/26/2023	RK	emails to Keith-Ann Steed, David Jones & Melinda Flores re: Magnolia Management EIN	0.75	225.00	B240
			-	-	B240
			-	-	B240
			-	-	B240
			-	-	B240
			-	-	B240
			-	-	B240
			-	-	B240
			-	-	B240
			-	-	B240
			-	-	B240
			1.50	\$ 450.00	

Total Invoice Amount

Rachel Kennerly, LLC
3039 Ted Trout Dr
Lufkin, TX 75904

Date	Airfare/Train	Mileage	Meals	Auto	Hotel	Other	Total
1-Dec	-	-	-	-	-	-	-
2-Dec	-	-	-	-	-	-	-
3-Dec	-	-	-	-	-	-	-
4-Dec	-	-	-	-	-	-	-
5-Dec	-	-	-	-	-	-	-
6-Dec	-	-	-	-	-	-	-
7-Dec	-	-	-	-	-	-	-
8-Dec	-	-	-	-	-	-	-
9-Dec	-	-	-	-	-	-	-
10-Dec	-	-	-	-	-	-	-
11-Dec	-	-	-	-	-	-	-
12-Dec	-	-	-	-	-	-	-
13-Dec	-	-	-	-	-	-	-
14-Dec	-	-	-	-	-	-	-
15-Dec	-	-	-	-	-	-	-
16-Dec	-	-	-	-	-	-	-
17-Dec	-	-	-	-	-	-	-
18-Dec	-	-	-	-	-	-	-
19-Dec	-	-	-	-	-	-	-
20-Dec	-	-	-	-	-	-	-
21-Dec	-	-	-	-	-	-	-
22-Dec	-	-	-	-	-	-	-
23-Dec	-	-	-	-	-	-	-
24-Dec	-	-	-	-	-	-	-
25-Dec	-	-	-	-	-	-	-
26-Dec	-	-	-	-	-	-	-
27-Dec	-	-	-	-	-	-	-
28-Dec	-	-	-	-	-	-	-
29-Dec	-	-	-	-	-	-	-
30-Dec	-	-	-	-	-	-	-
31-Dec	-	-	-	-	-	-	-
Total	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -